## IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF GEORGIA COLUMBUS DIVISION

WILHEN HILL BARRIENTOS, et al	WII	HEN	HILL	BAI	RRIEN	ITOS.	et al
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Plaintiffs,

v.

CORECIVIC, INC.,

Civil Action No. 4:18-cv-00070-CDL

Defendant.

## **Declaration of Caitlin J. Sandley**

- I, Caitlin J. Sandley, hereby declare and state as follows:
- My name is Caitlin J. Sandley. I am a Senior Staff Attorney at the Southern Poverty
  Law Center. I represent Plaintiffs in the above-captioned litigation.
- 2. True and accurate copies of the following exhibits are attached to Plaintiffs' Response in Opposition to CoreCivic's Motion for Payment of Expert Fees:

Exhibit	Description			
A	Emails Between CJ Sandley and Jacob Lee			
В	Table Showing Rates of Psychiatrist and Medical Doctor Experts in Prison and			
	Detention Conditions Cases			
C	Excerpt of Transcript of Proceedings, Ferreira v. Penzone, No. CV15-01845-PHX-			
	JAT (D. Ariz. June 13, 2018), ECF No. 383			
D	Excerpt of Exhibit in Support of Corizon Health, Inc.'s Mot. For Summary			
	Judgment, Report of Dr. Penn, Hughes v. Polk County Sheriff, No. 8:12-cv-00568-			
	SDM-MAP (M.D. Fla. Mar. 15, 2013), ECF No. 294-3			
Е	Excerpt of Transcript of Trial on the Merits Vol. 3, Jackson v. Ford, No. A 10-CA-			
	522 SS (W.D. Tex. Jan. 25, 2012), ECF No. 168			
F	Excerpt of Civil Docket, Knox v. Melvin, No. 1:17-CV-01237-JEH (C.D. Ill. May 5,			
	2017)			
G	Excerpt of Deposition of Joseph V. Penn (Mar. 8, 2022)			
Н	Excerpt of Exhibit in Support of Motion in Limine, Report of Dr. Penn, Ferreira,			
	No. CV15-01845-PHX-JAT (D. Ariz. Feb. 28, 2018), ECF No. 261-1			

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 28th day of March, 2022 in Montgomery, Alabama.

Caitlin J. Sandley

Eastling. Sandley